

HC 70 Box 3500  
Sahuarita, Arizona 85629  
May 11, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

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Re: Docket No. 98N-1038, Irradiation in the Production, Processing and Handling of Food

To Whom It May Concern:

The FDA should retain the current labeling law, the current terminology of "treated with irradiation" and the use of the radura symbol on all irradiated foods. The label should be large enough to be readily visible to the consumer and should be placed on the front of the package. The label contains important information regarding the processing of the contents and therefore deserves a prominent place on the packaging. For unpackaged whole foods such as produce, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale or put on tags that are tied to the produce or pasted on the individual fruit along with the company names that are often found there.

Like any other label, irradiation labels are required by the FDA to be truthful, not misleading. "Electronic pasteurization" or "cold pasteurization" are misleading terms because pasteurization is an entirely different process of heating and cooling not normally associated with nuclear irradiation.

In its initial petition the FDA concluded that irradiation was a "material fact" about the processing of food and therefore should be disclosed. The material fact remains therefore the labeling requirement should remain. Irradiation alters the nutrients in food, causes changes in sensory and storage characteristics and causes chemical changes in food that may be hazardous. Consumers have a right to know if this process has been used on their food.

The requirement of irradiation exposure labeling should not expire. Consumers need to know and be educated as to what this process does to their food. This technology is still very new and there is a definite need to assess the public health effects of ingesting irradiated foods.

I urge you to place the comments received on the Internet so that the public can be informed about who is participating in this comment process.

Thank you for your attention.



D. G. Chilson

cc: Representative Jim Kolbe  
Senator Jon Kyl  
Senator John McCain

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